PERFORMANCE WORK STATEMENT

Contract: EP-C-15-022
Work Assignment No. 3-96
Period of Performance: 9/4/18-12/31/19

I. ADMINISTRATIVE

A. Title: Support for Region 8 Underground Injection Control Dewey-Burdock Permitting Actions

B. Work Assignment Manager:

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C. Quality Assurance:

This work assignment does not involve the generation of environmental data, the use of secondary data or the development or application of a model. Task 1 does involve analysis of the criteria for conceptual site model and geochemical groundwater model development. Section B11 *Special Requirements for the Contract* in the *Programmatic Quality Assurance Project Plan for Work Assignments Issued Under Contract no. EP-C-15_022* covers the QA methods for model application or development. These methods are also applicable to Task 1 under this work assignment.

D. Background:

The Underground Injection Control (UIC) Program is authorized under the Safe Drinking Water Act. The primary mission of the UIC Program is the regulation of injection wells for the protection of underground sources of drinking water (USDWs). The definition of USDW is found in UIC regulations at 40 Code of Federal Regulations (CFR) §144.3.

The Region 8 UIC Program has proposed three distinct but related actions at the Dewey-Burdock Site: a Class III draft permit authorizing injection of fluid into uranium ore zones for uranium recovery; an aquifer exemption for the uranium-bearing zones and a Class V deep well permit to dispose of treated ISR waste fluids generated at the Dewey-Burdock site. These actions are regulated under the UIC regulations found at 40 CFR parts 124, 144 and 146. Additionally, UIC regulations specific to injection wells in South Dakota are found at 40 CFR 147 Subpart QQ. In addition to the UIC Class III permit, the site is also regulated by the Nuclear Regulatory Commission (NRC). The NRC has issued a Radioactive Materials Handling License for the site.

The Class III draft permit specifies conditions for injection of fluid into uranium ore bodies for the in-situ recovery (ISR) of uranium. The Class III injection wells are constructed within ISR wellfields and completed in aquifers containing uranium ore bodies. Because uranium recovery will involve mobilization of uranium in USDWs, the UIC program also proposed the exemption of portions of the

USDWs where the uranium bodies are located. The permittee has already presented a fairly comprehensive conceptual site model of pre-ISR geohydrologic and geochemical conditions at the site in the UIC permit application. The draft permit requires the permittee to conduct more detailed geohydrologic assessment for each wellfield before the EPA will issue authorization to commence injection in each wellfield for uranium recovery. After the completion of uranium recovery in each wellfield, the NRC License requires the wellfield groundwater to be restored to pre-ISR concentrations for ISR contaminants. If pre-ISR groundwater concentrations are not achievable for one or more ISR contaminant, the NRC may approve an alternate concentration limit (ACL) for one or more ISR contaminants.

UIC regulation 40 CFR § 146.10 (a)(4) states "The [injection well] plugging and abandonment plan … shall, in the case of a Class III project which underlies or is in an aquifer which has been exempted under §146.04, also demonstrate adequate protection of USDWs. The Director shall prescribe aquifer cleanup and monitoring where he deems it necessary and feasible to insure adequate protection of USDWs."

In order to ensure the adequate protection of the USDWs outside the wellfield aquifer exemption boundaries, the Region 8 UIC Program has determined that it is appropriate to propose in a second Class III draft permit a requirement directing the permittee to develop further the conceptual site model to include characterization of site geohydrologic and geochemical conditions through all ISR lifecycle phases, including ISR operations, groundwater restoration and post-restoration conditions when the natural groundwater flow conditions have resumed. The Region 8 UIC Program has also determined that it is appropriate to require the permittee to conduct geochemical groundwater modeling that encompasses the geochemical changes that occurred during ISR operations to evaluate the potential for ISR contaminants to cross the aquifer exemption boundary into the USDW downgradient from restored ISR wellfields. The Region 8 UIC Program is seeking contractual support to analyze and develop criteria for a robust conceptual site model and geochemical groundwater model for all life cycles phases of the ISR process. Because the Region 8 UIC Program will be basing permit requirements on this information, this PWS and the Contractor's work plan will be part of the administrative record for the second Class III draft permit.

The Dewey-Burdock project site is located near the Black Hills in South Dakota. The Black Hills are of historic interest to many tribes. The UIC permitting actions have resulted in a lengthy, complicated tribal consultation process that began in 2013, but has not reached successful completion. The lengthy, complicated tribal consultation process has added considerable time to the UIC Dewey-Burdock permitting process. The Region 8 UIC Program is seeking contractual assistance to bring the Dewey-Burdock tribal consultation process to successful and timely completion.

The Region 8 Tribal Assistance Program maintains a contact list of tribal leaders for Region 8 tribes, but does not include Tribal Historic Preservation Officers (THPOs). The Department of Housing and Urban Development (HUD) recently updated its Tribal Directory Assistance Tool (TDAT) with new information gathered from Indian tribes. TDAT is a free, web-accessible contact database that contains information about federally recognized Indian tribes and their geographic areas of current and ancestral interest at the county level. It lists names and contact information for tribal leaders and THPOs as well as links to tribal websites. Users can query the database by street address, county, state, and tribe. Information generated from TDAT can be exported in spreadsheet format for use in other programs. TDAT was designed to help users quickly identify tribes and provide appropriate tribal contact information to assist with initiating Section 106 consultation. For more information about TDAT, see the ACHP's information paper at [HYPERLINK "http://www.achp.gov/tdat.html"]. TDAT can be accessed at [HYPERLINK "https://egis.hud.gov/tdat/"].

As part of the administrative record for the draft UIC permits, the Region 8 UIC Program developed fact sheets for both UIC draft permits, a draft record of decision for the aquifer exemption, a draft cumulative effects analysis document, a draft environmental justice analysis document and a draft document proposing the Region 8 UIC Program's plan for complying with Section 106 of the National Historic Preservation Act. These documents were also available for public review and comment.

The UIC permitting process requires the Region 8 UIC Program to conduct a public comment period per requirements under 40 CFR § 124.10 and issue a response to comments under 40 CFR § 124.17. During the public comment period for the Dewey-Burdock site, the EPA received a large volume of comments on the proposed UIC actions and draft documents. In a previous Work Assignment (2-94) under this contract, Cadmus categorized the comments into 43 different topics. Responses to many of the comments are found in the draft documents that were part of the administrative record. The EPA is seeking contractual support to develop a response-to-comments document based on the comment topics in the categorized comment document deliverable generated under the previous Work Assignment and the information in the draft documents that were part of the administrative record.

II. OBJECTIVE

The objective of this Work Assignment is to obtain contractual support for the Region 8 UIC Program (hereafter EPA) to proceed efficiently with permitting activities at the Dewey-Burdock Uranium Site by:

1. Conducting literature review and technical analysis to analyze and develop criteria for a robust conceptual site model and geochemical groundwater model for all life cycles phases of the ISR process.
    a. The geohydrologic and geochemical conceptual site model of the uranium ISR site should include all lifecycle phases of ISR operations and conditions after groundwater restoration has been completed in each wellfield and natural groundwater flow conditions have resumed at the site and
    b. The geochemical groundwater model should encompass the geochemical changes that occurred during ISR operations to evaluate the potential for ISR contaminants to cross the aquifer exemption boundary into the USDW downgradient from restored ISR wellfields at the permitted site;
2. Providing assistance in adding contact information to EPA-generated tribal consultation letters that will be mailed to approximately 23 tribes on two separate occasions;
3. Providing assistance in contacting tribal offices to identify the designated tribal contacts for the Dewey-Burdock consultation process, identify tribes who are interested in scheduling consultation meetings with the EPA and schedule consultation meetings with interested tribes; and
4. Developing a general framework for the response-to-comment document based on:
    a. The comment topics in the categorized comment document deliverable generated under the previous Work Assignment and
    b. The information available in the draft documents that were a part of the Dewey-Burdock administrative record.

III. TASK DETAIL

The contract level sections that support this work assignment include: 2.2, 2.3, and 4.3.

The LOE for this work assignment is: 1015 hours.

The Contractor shall perform the following tasks.

Task 0: Work Plan and Monthly Progress Reports

Subtask 0.1: The Contractor shall develop a work plan that describes how each task will be carried out. The work plan shall include a schedule, staffing plan, level of effort (LOE), and cost estimate for each task, the Contractor's key assumptions on which staffing plan and budget are based, and qualifications of proposed staff. If a subcontractor(s) is proposed and subcontractors are outside the local metropolitan area, the Contractor shall include information on plans to manage work and contract costs.

Subtask 0.2: This task also includes monthly progress and financial reports. The monthly progress report shall indicate, in a separate QA section, whether significant QA issues have been identified and how they are being resolved. Monthly financial reports must include a table with the invoice LOE and costs broken out by the tasks in this WA.

Task 1: Analyze and develop criteria for a geohydrologic and geochemical conceptual site model and a geochemical groundwater model at a uranium ISR site for all life cycles phases of the ISR process, including after groundwater restoration has been completed in each wellfield and natural groundwater flow conditions have resumed, to evaluate the potential for ISR contaminants to cross the aquifer exemption boundary.

The LOE for Task 1 is: 450 hours.

Subtask 1.1: Conduct review of technical literature to identify and analyze the specifications for an appropriate geohydrologic and geochemical conceptual site model that includes characterization of a uranium ISR site after the ISR operations and groundwater restoration have been completed and identifying information needed to calibrate the geochemical groundwater model described in Task 1.5.

The EPA will provide the Contractor with:

1. The Class III permit application, the first Class III draft permit and the fact sheet the EPA developed for the first Class III draft permit. These documents will provide information about the permittee's pre-ISR conceptual site model and the measures for protection of USDWs the EPA proposed in the first Class III draft permit.
2. Suggested reference documents to review. (However, the Contractor is free to review additional technical references.)

The Contractor shall provide an annotated bibliography of references the Contractor uses. Annotations should include the pertinent portions of each reference used to support Subtasks 1.2 and 1.3.

Subtask 1.2: Develop criteria to create an appropriate geohydrologic and geochemical conceptual site model that includes characterization of a uranium ISR site after the ISR operations and groundwater restoration have been completed and identifying information needed to calibrate the geochemical groundwater model described in Task 1.5.

The purpose of the conceptual site model is to characterize the sources of contamination and pathways to the compliance boundary (the aquifer exemption boundary) to serve as the foundation for an analysis plan to collect data appropriate for calibration of the geochemical model discussed in Task 2. Field data would include:

1. Geologic samples from at least one restored wellfield injection zone to analyze and identify the minerals present in the post-ISR altered injection zone.
2. Geologic samples from the injection zone downgradient from the wellfield to analyze and identify minerals present that could naturally attenuate any ISR contaminants moving downgradient. The permittee should obtain samples from the injection zone downgradient from at least one wellfield:
    a. where normal reducing conditions are known to exist and
    b. where the injection zone aquifer has been impacted by oxidizing conditions (Burdock Wellfields 6, 7 and 8[1])
3. The restored wellfield groundwater quality sampling results from the stability monitoring period.
4. The Contractor may determine additional sampling and analysis is needed for geochemical model calibration and should be included in the conceptual site model requirements.

Laboratory testing might include column testing, batch sorption testing or other appropriate laboratory test as identified by the Contractor.

As required by the NRC license, the permittee must initiate groundwater restoration activities to restore the injection interval to NRC-approved baseline water quality limits, drinking water standards (MCLs) or ACLs for the baseline water quality constituents listed in Table 14.2 of the Class III Permit Application. Once the target concentrations are met within the wellfield, a period of restoration stability monitoring occurs during which the groundwater quality within the wellfield is monitored to confirm that the constituent concentrations do not increase above the target restoration goals. The NRC license requires Powertech to conduct restoration stability monitoring until the data show the most recent four consecutive quarters indicate no statistically significant increasing trend for all constituents of concern that would lead to an exceedance above the respective standard in 10 CFR Part 40, Appendix A, Criterion 5B(5). The NRC approves wellfield restoration once it is complete.

The EPA is aware of one ISR site where the post-ISR, geochemically-altered injection zone has been characterized to evaluate the potential for concentration rebounds for constituents of concern and to evaluate ACLs[2]. This site is the Cameco Smith Ranch – Highland Uranium Project Mine Unit 1 in Wyoming. Post-ISR injection zone core was also drilled in Mine Unit 4 at the same site for research

[1] For additional explanation, see Section 5.6 of the first Class III draft permit fact sheet, *Additional Characterization of Burdock Wellfields 6, 7, and 8.*

[2] [HYPERLINK "https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML18186A538"]

purposes.[3,4] The conceptual site model should take the need for this information into consideration in order to evaluate the potential for rebound of ISR contaminant concentrations after the NRC has approved wellfield restoration.

Downgradient injection zone geochemistry should be taken into consideration in order to evaluate the attenuation capacity for 1) ISR contaminants for which the NRC has approved ACLs and 2) any ISR contaminants for which it is likely that rebound in concentration may occur after the NRC has approved wellfield restoration.

Subtask 1.3: Develop a background document explaining the rationale behind the conceptual site model criteria.

The Contractor shall develop a background document explaining the rationale behind the conceptual site model criteria identified. The information to be discussed in the background document should include:

1. a description of the conceptual site model elements,
2. an explanation of how the elements were derived,
3. an explanation of how the conceptual site model will serve to identify the components of an analysis plan supporting the geochemical groundwater model,
4. a discussion of how the conceptual site model will contribute to the protection of USDWs at the site, and
5. any other information the Contractor deems appropriate.

The EPA will consider the information in this background document during the development of the fact sheet for the second Class III draft permit to explain to stakeholders the function of the conceptual site model and how it will contribute to the protection of USDWs. The background document should also include a list of analytes for field and laboratory samples appropriate for input to and calibration of the geochemical groundwater model based on consideration of Table 14.2 of the Class III Permit Application, which corresponds to the NRC license analytes list, and Table 8 in the first Class III draft permit.

Subtask 1.4: Conduct review of technical literature to identify and analyze the specifications for an appropriate geochemical groundwater model to evaluate the potential for ISR contaminants to cross the aquifer exemption boundary.

The EPA will provide the Contractor with reference documents including documents generated under a Regional Applied Research Effort conducted with the U.S. Geological Survey (USGS). The USGS developed reactive transport models using geohydrologic data from the site.

The Contractor shall provide a brief annotated bibliography of references the Contractor uses. Annotations should include the pertinent portions of the references that were used to support Subtasks 1.5, 1.6 and 1.7.

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[3] Gallegos, T.J., Campbell, K.M., Zielinski, R.A., Reimus, P.W., Clay, J.T., Janot, N., Bargar, J.R., Benzel, W.M., 2015. Persistent U(IV) and U(VI) following in-situ recovery (ISR) mining of a sandstone uranium deposit, Wyoming, USA. Appl. Geochem 63, 222e234.

[4] WoldeGabriel, G., Boukhalfa, H., Ware, S.D., Chesire, M., Reimus, P., Heikoop, J., Conradson, S.D., Batuk, O., Havrilla, G., House, B., Simmons, A., Clay, J., Basu, A., Christensen, J.N., Brown, S.T., DePaolo, D.J., 2014. Characterization of cores from an in-situ recovery mined uranium deposit in Wyoming: implications for postmining restoration. Chem. Geol. 390, 32e45.

Subtask 1.5: Develop criteria to create an appropriate geochemical groundwater model to evaluate the potential for ISR contaminants to cross the aquifer exemption boundary and identify information needed to calibrate the geochemical groundwater model.

The geochemical groundwater model should include these stages of the ISR life cycle:

1. hydrogeologic conditions before ISR operations begin to alter the injection zone geochemistry,
2. the impacts of the ISR process altering the geochemistry of the wellfield injection zone,
3. restored wellfield groundwater flowing through the unaltered injection zone downgradient from the restored wellfield,
4. native groundwater upgradient of the restored wellfield flowing through the restored wellfield and
5. native groundwater upgradient of the restored wellfield flowing through the injection zone downgradient of the restored wellfield.

It may be appropriate for the geochemical groundwater model to include pre-ISR stages such as the aquifer conditions before deposition of the uranium ore bodies and the geochemical process resulting in the deposition of uranium ore. The Contractor should determine if modeling these life-cycle stages are beneficial to the purpose of the model.

The purpose of the model is:

1. To examine the altered geochemistry of the restored wellfield to evaluate the potential for any ISR contaminants that have met target restoration goals in the wellfield to rebound due to the effects of residual oxygen in injection zone pore spaces,

2. To evaluate the potential for any ISR contaminants subject to post-restoration concentration rebound to cross the downgradient aquifer exemption boundary, based on evaluation of the attenuation capacity of the downgradient injection zone mineralogy,

3. To evaluate the potential for any ISR contaminants for which the NRC approved ACLs to cross the downgradient aquifer exemption boundary and

4. To examine the effects of native injection groundwater located upgradient of the restored wellfield on
    a. the restored wellfield once this upgradient groundwater flows into the restored wellfield and
    b. on any adsorbed ISR contaminants in the injection zone downgradient from the restored wellfield.

The permit requirements should also include a list of analytes for field samples and any laboratory testing that should be performed to provide model input or calibration data.

In addition to modeling the injection zone, the requirement should also include modeling non-injection zone aquifers if they were impacted by a vertical excursion at some point during ISR operations. For additional explanation on vertical excursions see Section 12.6 of the first Class III draft permit fact sheet, *Excursion Monitoring*.

Subtask 1.6: Develop a background document explaining the rationale behind the geochemical groundwater model permit requirements.

The Contractor shall develop a background document explaining the rationale behind the geochemical groundwater model permit requirements. The information to be discussed in the background document should include:

1. a description of the model,
2. model strengths and limitations,
3. sensitivity analyses that should be conducted,
4. examples of how this type of model has been used successfully at other sites,
5. other pertinent information the Contractor identifies, and
6. how the geochemical groundwater model will contribute to the protection of USDWs at the site.

The EPA will consider the information in this background document during the development of the fact sheet for the second Class III draft permit to explain to stakeholders the function of the geochemical groundwater model and how it will contribute to the protection of USDWs. The more technical aspects of the discussion may be included in an appendix to the fact sheet if appropriate.

Subtask 1.7: Develop an acceptance criteria document for the geochemical groundwater model.

The Contractor shall develop a checklist of acceptance criteria that will serve two purposes:

1. to guide the pemittee in model development so the model results will meet the intended needs and
2. to guide the EPA model reviewer in evaluation of the model results in order to determine if the model and the data quality for model inputs and calibration were robust enough to serve the intended purpose. This document will be included as an appendix to the Class III permit.

Task 1 Deliverables:

1. Annotated bibliographies of references described in Subtasks 1.1 and 1.4 in word-searchable Adobe Acrobat format.
2. Criteria documents described in Subtasks 1.2 and 1.5 in word-searchable Adobe Acrobat format from which text may be copied and pasted.
3. Background documents described in Subtasks 1.3 and 1.6 in word-searchable Adobe Acrobat format and Microsoft Word format.
4. Acceptance criteria document described in Subtask 1.7 in word-searchable Adobe Acrobat format and Microsoft Word format.

The performance period for this Work Assignment allows the EPA 5 business days from "Due Date to EPA" listed in Table 1 to review each deliverable and respond back to the Contractor with comments. The Contractor will have 10 business days to address EPA comments and provide the final deliverable. Additional time may be requested by either EPA or the Contractor if complicated issues or unforeseen events arise.

The EPA would like for the opportunity to hold a kick-off call before the Contractor submits a work plan to discuss the Work Assignment tasks and get feedback from the Contractor on whether the Contractor agrees the timeframes set in this Work Assignment are achievable. This call with also be an opportunity for the Contractor to ask clarifying questions to facilitate the preparation of the work plan. The EPA would also like the opportunity to discuss progress with the Contractor at the 5th and 25th business day increments. The Contractor may at any time request a call with EPA to ask clarifying questions or make recommendations.

Task 2: Administrative support with tribal consultation tasks

The LOE for Task 1 is: 160 hours.

The EPA will provide the Contractor with:

1. The template tribal consultation letter as an MS Word file,
2. The contact list from the last tribal consultation letter the EPA mailed,
3. The EPA tribal contact list (Because the tribal contact list is subject to change, the EPA will continue to send updated lists during the performance period of this Work Assignment.) and
4. A list of tribes that will receive the consultation letter.

Subtask 2.1: Generate the tribal contact list.

The Contractor shall generate a tribal contact list for the list of tribes supplied by the EPA per #4 above. The contact information should include the names, mailing addresses and email addresses for the tribal leaders and the names and email addresses for the tribal environmental directors and the THPOs. The list should be in the file format appropriate for the Contractors use to perform a mail merge with the template tribal consultation letter. A copy of the contact list should also be provided to the EPA in MS Word format.

Subtask 2.2: Prepare a tribal consultation letter for each tribe on the mailing list from a template letter provided by the EPA.

1. The Contractor shall generate the individual tribal consultation letters, addressed to the tribal leader with a courtesy copy list comprised of the tribal environmental director and the THPO.
2. The Contractor shall send the EPA an MS Word file containing the letters ready for printing and signature.

Subtask 2.3 Email the pdfs of the signed letters and save emails to pdf files.

1. After signature, the EPA will scan all the signed letters to pdf files and email them back the Contractor along with enclosures.
2. The Contractor shall email the letters to the tribal leaders, the environmental directors and THPOs.
3. The contractor shall save the emails as pdf files and send the pdf files to the EPA to add to the administrative record.

Subtask 2.4: Forward any emails from tribes to EPA and save the emails to pdf files.

1. If any tribes send emailed replies, the Contractor should immediately forward the emails to the EPA Work Assignment Manager, Bruce Suchomel, and copy the Technical Contact, Valois Shea.
2. Each email from a tribe should be saved to a pdf file and sent to the EPA with the following monthly report.

Subtask 2.5: Identify tribes for interested in consultation with the EPA and identify designated tribal contacts.

After 15 business days from emailing the consultation letters to the tribal contacts, the Contractor shall call the tribal offices to:

1. Determine if the tribe wishes to schedule a consultation meeting with the EPA and

2. Identify the designated tribal contact for the Dewey-Burdock consultation process. The EPA has already identified the designated tribal contact for the Cheyenne River Sioux Tribe, however, this contact should be confirmed by the Contractor.

If the tribal office or tribal contact has any questions or comments, the Contractor should

1. refer them to the EPA technical contact and
2. notify EPA of the referral.

Subtask 2.6: Schedule tribal consultation meetings.

Once the Contractor has identified the tribes that are interested in scheduling a tribal consultation meeting and the designated tribal contact, the contractor shall begin the process of scheduling consultation meetings. The Contractor shall provide the EPA with an updated list of tribes and designated tribal contacts. Perhaps the list can be saved on a SharePoint or ftp site that the EPA can check periodically and receive email messages when the Contractor updates the file.

The EPA Technical Contact will provide updated lists dates and times of availability for the Contractor to offer to the tribes.

The Contractor should call or email the designated tribal contact and offer the available times for scheduling meetings. If a call is made, the Contractor should send a follow-up email message containing the same information as was conveyed during the call. The email message should refer to the call or voicemail message left with the tribe.

Once a tribe schedules a consultation meeting, the Contractor should immediately email the EPA Work Assignment Manager, Bruce Suchomel, and copy the Technical Contact, Valois Shea, so they may begin travel arrangements.

Enclosed with the monthly report, the Contractor should include a list of calls or emails sent to tribal contacts that occurred during the reporting period. The list should include the tribe and tribal contact name, indicate if a voicemail message was left rather than a live conversation, and include with times and dates. Emails should be saved as pdf files, including emailed replies from tribes.
The EPA anticipates this task will continue until 6 weeks before the issue date of the final permit decision. The Work Assignment Manager will notify the Contractor of this date.

Subtask 2.7: Prepare a final tribal consultation letter for each tribe on the mailing list from a template final tribal consultation letter provided by the EPA

The EPA will provide the Contractor with:

1. The template final tribal consultation letter as a MS Word file,
2. A list of tribes that will receive the consultation letter, and
3. An updated Region 8 tribal contact list.

The Contractor shall:

1. Generate the individual final tribal consultation letters, addressed to the tribal leader with a courtesy copy list comprised of the tribal environmental director and the THPO.
2. Send the EPA an MS Word file containing the letters ready for printing and signature.

Subtask 2.7 Email the pdfs of the signed letters and save emails to pdf files.

1. After signature, the EPA will scan all the signed letters to pdf files and email them back the Contractor along with any enclosures.
2. Email the letters to the tribal leaders, the environmental directors and THPOs.
3. Save the emails as pdf files and send the pdf files to the EPA to add to the administrative record.
4. Immediately forward any emails received from tribes per Subtask 2.4 and save the emails as pdf files to include with next monthly report.

Subtask 2.8: Follow-up calls to tribes to confirm receipt of the final consultation letter.

After 5 business days from emailing the final consultation letters to the tribal contacts, the Contractor shall contact the tribal offices to:

1. Confirm that the tribal leader has received the final consultation letter and
2. Offer one last opportunity to schedule a consultation meeting.

The Contractor shall provide the EPA with a list of calls made including name of person called, times and dates and any emails sent including dates and copies of any emails saved as pdf files, including emailed replies from tribes.

Task 2 Deliverables:

1. A copy of the final tribal contact list containing the name and mailing address for each tribal leader, the names and email addresses of the tribal environmental director and THPO for each tribe on the mailing list provided by EPA.
2. An MS Word file of the letters ready for the EPA to print and route for signature.
3. Email pdf files of the signed consultation letters (received from the EPA) to each tribal leader and copy the tribal environmental director and THPO.
4. Pdf files of the emails sent to tribes in response to the consultation letter, either emailed to the EPA or made available on a SharePoint or ftp site.
5. Pdf files of any emailed replies from tribes emailed to the EPA or made available on a SharePoint or ftp site.
6. A list of tribes and designated tribal contact for each tribe interested in scheduling consultation meetings with the EPA, updated as needed, saved on a SharePoint or ftp site that the EPA can check periodically and receive email messages when an update to the file has occurred. (Email messages should be sent to the Work Assignment Manager and copy the Technical Contact)
7. Immediate notification to the EPA when a tribe schedules a consultation meeting.
8. A monthly list of all calls or emails to tribal contacts during the reporting period and copies of all emails saved as pdf files, including emails sent from tribes or make this information available on a SharePoint or ftp site.
9. An MS Word file of the final consultation letters ready for the EPA to print and route for signature.
10. Email pdf files of the signed final consultation letters (received from the EPA) to each tribal leader and copy the tribal environmental director and THPO.
11. Pdf files of any emailed replies from tribes in response to the final consultation letters, emailed to the EPA or made available on a SharePoint or ftp site.
12. List of tribes called per Subtask 2.8, including name of person called, times and dates and any emails sent including dates and copies of any emails saved as pdf files, including emailed replies from tribes.

Task 3: Development of the Response to Comments Document for the Region 8 Underground Injection Control Permitting Actions at the Dewey-Burdock Uranium In-Situ Recovery Site

The LOE for Task 1 is: 405 hours.

Subtask 3.1: Review all the documents provided by the EPA and identify responses to comments received that are available in these documents.

To initiate this work, the EPA will supply the contractor with:

1. The UIC Class IIII draft permit and fact sheet,
2. The UIC Class V draft permit and fact sheet,
3. The proposed aquifer exemption Record of Decision,
4. The draft cumulative effects analysis document,
5. The draft environmental justice analysis document,
6. The draft document proposing the EPA's plan for complying with Section 106 of the National Historic Preservation Act, and
7. The document containing the public comments received categorized under the 43 topics, which was a deliverable from Work Assignment 2-94.

Subtask 3.2: Develop a framework document for the response to comments.

The Contractor shall write a brief introduction to each comment topic identified in the categorized comment document. The introduction should summarize the full scope of concepts included in the comments.

During this process, the contractor may determine it is appropriate to combine similar comment topics or further split out comments previously grouped under a single topic.

Comment category #1 contains comments that stated general opposition to the Dewey-Burdock project but did not include specific information applicable to the UIC Program. This lack of specific information prevents the UIC program from generating a response to these comments. This comment category should be included near the end of the document and before the topics included in Table 1 below.

Comment category #42, *Comments about Crow Butte*, will be addressed by EPA Region 7. This category should be placed before comment category #1.

The comment topics included in Table 1 are beyond the scope of the UIC Program regulatory authority and no UIC regulations or permit requirements apply to these topics. These comment topics should be grouped under a section of the document with the heading "Comments on Issues outside the Scope of UIC Program Regulatory Authority" and included at the end of the document.

Table 1. Comments outside the scope of the UIC program.

Category No.	Comment Category Title
12	Concerns about hydraulic fracturing.
16	Against uranium mining in general.
17	Against uranium mining because of problems with nuclear power generation and nuclear weapons.
18	Concerns about the price of uranium, future demand for uranium and future viability of nuclear energy.
19	Concerns about effects of past uranium mining.

20	Concerns about Azarga (e.g. integrity of investors, integrity of company itself, solvency, experience in the ISR industry, etc.).
35	Concerns the project will not benefit Edgemont, the Counties, the States or the USA.
36	Comment topic unrelated to the UIC draft permits & aquifer exemption.
37	Any additional topics not included in the above list.
38	Comments about other government agencies or regulatory programs (NEPA, the Clean Air Act, the Nuclear Regulatory Commission, etc.)
39	Comments about the cost or technical feasibility of treating/remediation of contaminated groundwater

Subtask 3.3: Include responses to comments that are addressed in the draft documents the EPA developed for the administrative record.

Many of the comments the EPA received are already addressed in the documents the EPA prepared for the administrative record. These documents are listed under Subtask 3.1.

The Contractor should include responses to comments as addressed by the information in these documents.

After these responses are included, there may be additional concepts expressed in the comments that were not fully addressed by the information in the draft documents. There may be comment topics that are not addressed by any information in the draft documents. The Contractor should flag these areas to identify the concepts or comment topics not fully addressed by the available information. The EPA will complete the response to comment document and address any remaining concepts and comments.

IV. SCHEDULE OF DELIVERABLES:

Table 1. List of Deliverables and Due Dates

No.	DELIVERABLE	DATE DUE TO EPA
Task 0: Work Plan and Monthly Progress Reports		
0.1	Work plan, budget, QAPP and QA supplemental	According to contract
0.2	Monthly progress and financial reports	Monthly
Task 1: Conceptual Site Model and Geochemical Groundwater Model		
	Conference call/web conference to discuss progress	Approximately 5 days after start of WA
1.1	Annotated bibliography for the conceptual site model in searchable Adobe Acrobat format	Within 15 business days after start of WA
1.2	The criteria document for the conceptual site model in word-searchable Adobe Acrobat format from which text may be copied and pasted.	Within 15 business days after start of WA
1.3	Background document for the conceptual site model permit requirement in word-searchable Adobe Acrobat format and Microsoft Word format.	Within 15 business days after start of WA
	Conference call/web conference to discuss progress	Approximately 3 days after start of WA
1.4	Annotated bibliography for the geochemical groundwater model in searchable Adobe Acrobat format.	Within 40 business days after start of WA.
1.5	The criteria document for the geochemical groundwater model in word-searchable Adobe Acrobat format from which text may be copied and pasted.	Within 40 business days after start of WA.
1.6	Background document for the geochemical groundwater model permit requirement in word-searchable Adobe Acrobat format and Microsoft Word format	Within 40 business days after start of WA.
1.7	Acceptance criteria document for the geochemical groundwater model in word-searchable Adobe Acrobat format and Microsoft Word format	Within 40 business days after start of WA.

Table 1. List of Deliverables and Due Dates - continued

No.	DELIVERABLE	DATE DUE TO EPA
Task 2: Support with Tribal Consultation Administrative Tasks		
2.1	A copy of the final tribal contact list containing the name and mailing address for each tribal leader, the names and email addresses of the tribal environmental director and THPO for each tribe on the mailing list provided by EPA	Within 5 business days after receiving the tribal mailing list from the EPA
2.2	An MS Word file of the letters ready for the EPA to print and route for signature	Within 5 business days after finalizing the tribal contact list.
2.3	Email pdf files of the signed consultation letters (received from the EPA) to each tribal leader and copy the tribal environmental director and THPO.	Within 5 business days of receiving the pdf files of the scanned signed letters from the EPA.
2.4	Pdf files of the emails sent to tribes in response to the consultation letter, either emailed to the EPA or made available on a SharePoint or ftp site.	Within 1 business day of emailing the letters to the tribes.
2.5	Pdf files of any emailed replies from tribes emailed to the EPA or made available on a SharePoint or ftp site.	Include with the next monthly report.
2.6	A list of tribes and designated tribal contact for each tribe interested in scheduling consultation meetings with the EPA, updated as needed, saved on a SharePoint or ftp site that the EPA can check periodically and receive email messages when an update to the file has occurred. (Email messages should be sent to the Work Assignment Manager and copy the Technical Contact)	Within two business days of receiving notification from the tribes interested in consultation.
2.7	Immediate notification to the EPA when a tribe schedules a consultation meeting.	Within 1 business day after hearing from the tribe.
2.8	A monthly list of all calls or emails to tribal contacts during the reporting period and copies of all emails saved as pdf files, including emails sent from tribes or make this information available on a SharePoint or ftp site.	Enclosed with the next monthly report.
2.9	An MS Word file of the final consultation letters ready for the EPA to print and route for signature.	Within 5 business days after receiving the tribal mailing list from the EPA
2.10	Email pdf files of the signed final consultation letters (received from the EPA) to each tribal leader and copy the tribal environmental director and THPO.	Within 5 business days of receiving the pdf files of the scanned signed letters from the EPA.
2.11	Pdf files of any emailed replies from tribes in response to the final consultation letters, emailed to the EPA or made available on a SharePoint or ftp site.	Within 1 business day of emailing the letters to the tribes.
2.12	List of tribes called per Subtask 2.6, including name of person called, times and dates and any emails sent including dates and copies of any emails saved as pdf files, including emailed replies from tribes.	

TASK No.	DELIVERABLE	DATE DUE TO EPA
Task 3: The Response to Comments Document		
3.1	An MS Word document containing introductions to comment topics with areas flagged for the EPA where the responses to some comments or comment concepts were not addressed by the information provided in the draft documents.	Within 55 business days after receiving the documents listed under Subtask 3.1 from the EPA..

V. MISCELLANEOUS – SOFTWARE APPLICATION AND ACCESSIBILITY (SECTION 508 REHABILITATION ACT AND AMENDMENTS)

Software Application Files and Accessibility

Software Application files, if delivered to the Government, shall conform to the requirements relating to accessibility as detailed to the 1998 amendments to the Rehabilitation Act, particularly, but not limited to, § 1194.21 Software applications and operating systems and § 1194.22 Web-based intranet and internet information and applications. See: http://www.section508.gov/

Preferred text format:	MS Word, 8.0 or higher (Office 2003 or higher)
Preferred presentation format:	Power Point, Office 2003 or higher
Preferred graphics format:	Each graphic is an individual GIF file
Preferred portable format:	Adobe Acrobat, version 6.0

VI. TECHNICAL DIRECTION

The CLCOR or WACOR is permitted to provide technical direction. Technical direction must be within the statement of work of the contract and includes: (1) Direction to the contractor which assists the contractor in accomplishing the PWS, (2) comments on and approval of reports or other deliverables. Technical direction will be issued in writing or confirmed in writing within five (5) calendar days after verbal issuance.

VII. TRAVEL

The contractor shall not anticipate any travel associated with this WA over the duration of the performance period.

VIII. MEETINGS, CONFERENCES, TRAINING EVENTS, AWARD CEREMONIES AND RECEPTIONS

All appropriate clearances and approvals required by Agency policy in support of any and all conference related activities and expenses, including support of meetings, conferences, training events, award ceremonies and receptions, including the form 5170 for all meetings costing more than $20,000, shall be obtained by the EPA CL-COR as needed and provided to the Contracting Officer (CO). Work under conference related activities and expenses shall not occur until this approval is obtained and provided by the EPA CL-COR.

IX. CONTRACTOR IDENTIFICATION

Contractor personnel shall always identify themselves as contractor employees by name and organization and physically display that information through an identification badge. Contractor personnel are prohibited from acting as the Agency's official representative. The contractor shall refer any questions relating to the interpretation of EPA policy, guidance, or regulation to the CO, CL-COR and/or WACOR.

X. PRINTING

All copying and printing shall be accomplished within the limitations of the printing clause of the contract.

XI. QUALITY ASSURANCE SURVEILLANCE PLAN

The contract QASP is applicable to this WA.